

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

DEC 14 2022

Clerk, U.S. District Court
Texas Eastern

UNITED STATES OF AMERICA

v.

ETHAN PERRY CHUNN

§
§
§
§
§

No. 4:22-CR- 287
Judge Mazzanti

INDICTMENT

SEALED

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 18 U.S.C. §
115(a)(1)(B) (Threatening a
Federal Official)

On or about June 24, 2022, within the Eastern District of Texas, **Ethan Perry Chunn**, defendant, did knowingly threaten to assault or murder the justices of the United States Supreme Court and did so with the intent to impede, intimidate, interfere with, or retaliate against the justices while they were engaged in the performance of their official duties.

In violation of 18 U.S.C. § 115(a)(1)(B).

Count Two

Violation: 18 U.S.C. § 875(c)
(Interstate Communications-
Threats)

On or about June 24, 2022, within the Eastern District of Texas, **Ethan Perry Chunn**, defendant, knowingly and with the intent to make a true threat and with

knowledge that the communication would be understood as a true threat, transmitted in interstate and foreign commerce, a communication containing a threat to injure the person of another, namely the justices of the United States Supreme Court, specifically by tweeting the following:

“Does anyone know where the Supreme Court justices live?? Also does anyone know how to make a pipe bomb? Asking for a friend.”

“Burn the Supreme Court to the fucking ground and don’t look back.”

“It’s time to kill Supreme Court Justices[;] they don’t deserve to live.”

In violation of 18 U.S.C. § 875(c).

Count Three

Violation: 18 U.S.C. § 875(c)
(Interstate Communications-
Threats)

On or about June 24, 2022, within the Eastern District of Texas, **Ethan Perry Chunn**, defendant, knowingly and with the intent to make a true threat and with knowledge that the communication would be understood as a true threat, transmitted in interstate and foreign commerce, a communication containing a threat to injure the person of another, namely Texas Attorney General Ken Paxton, specifically by tweeting to Paxton “Where is your office[?] I have a present I want to give you (it’s a bomb).”

In violation of 18 U.S.C. § 875(c).

A TRUE BILL



GRAND JURY FOREPERSON

BRIT FEATHERSTON
UNITED STATES ATTORNEY



D. RYAN LOCKER
Assistant United States Attorney

12-14-2022
Date

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

ETHAN PERRY CHUNN

§
§
§
§
§

No. 4:22-CR- 287
Judge Mazzini

NOTICE OF PENALTY

Count One

Violation: Violation: 18 U.S.C. § 115(a)(1)(B).

Penalty: Imprisonment for a term of not more than ten years; a fine not to exceed \$250,000.00, or both; supervised release of at least two years but not more than five years.

Special Assessment: \$100.00

Counts Two and Three

Violation: 18 U.S.C. § 875(c)

Penalty: Imprisonment for not more than five years, a fine not to exceed \$250,000, and a term of supervised release of not more than three years.

Special Assessment: \$100.00